

FILED IN UNITED STATES DISTRICT
COURT, DISTRICT OF UTAH

JAN 26 2021

DR. KIMBERLY A. FREE, CLERK
BY _____
DEPUTY CLERK

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IN THE UNITED STATES DISTRICT COURT

DISTRICT OF UTAH

UNITED STATES OF AMERICA, Plaintiff, v. JESUS GUADALUPE NAVARRO-PEREZ and VERONICA MARQUEZ-FRANCO, Defendants.	Case No. 4:22-mj-00003-PK FELONY COMPLAINT VIOLATION: <u>COUNT I</u> : 21 U.S.C. § 841(a)(1), Possession of Fentanyl with Intent to Distribute (>400 grams).
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Before United States Magistrate Judge Paul Kohler in the U.S. District Court for the
District of Utah, appeared the undersigned, who, on oath deposes and says:

COUNT I

21 U.S.C. § 841(a)(1)
(Possession of Fentanyl with Intent to Distribute)

On or about January 9, 2022, in the District of Utah,

JESUS GUADALUPE NAVARRO-PEREZ and VERONICA MARQUEZ-FRANCO,
defendants herein, did knowingly and intentionally possess with intent to distribute four hundred
(400) grams or more of a mixture or substance containing a detectable amount of N-phenyl-N- [1- (2-phenylethyl) -4-piperidinyl] propanamide ("Fentanyl"), a Schedule II controlled substance

within the meaning of 21 U.S.C. § 812, and did aid and abet therein, all in violation of 21 U.S.C. § 841(a)(1) and 18 U.S.C. § 2, and punishable pursuant to 21 U.S.C. § 841(b)(1)(A).

AFFIDAVIT IN SUPPORT OF FELONY COMPLAINT

I, Nick Hirschi, the undersigned complainant/affiant, being duly sworn, state the following is true and correct to the best of my knowledge and belief:

1. I am employed as an Officer of Enforcement and Removal Operations with the Department of Homeland Security and have been so employed since January of 2020. I have been assigned as a Task Force Officer (TFO) with the Washington County Drug Task Force since January of 2021. I have also been assigned as a TFO with Homeland Security Investigations (HSI) since January of 2022. Prior to my current assignments, I worked as an Agent with the United States Border Patrol and then as a K9 handler with the United States Border Patrol beginning in October of 2005. Based on my training and experience, I am familiar with incidents involving controlled substances and have investigated numerous criminal offenses, including the investigation of a variety of controlled substance related offenses. I am conducting the investigation of Jesus Guadalupe NAVARRO-PEREZ and Veronica MARQUEZ-FRANCO, and their involvement in the possession of fentanyl with intent to distribute described herein.

2. On January 9, 2022, Washington County Sheriff's Deputy Daniel Montgomery observed a vehicle with Colorado license plates traveling northbound on I-15 in Washington County. Deputy Montgomery observed the vehicle drift out of its lane of travel and then back into its lane of travel without signaling. Deputy Montgomery initiated a traffic stop based on the lane travel violation, and the vehicle had two occupants.

3. Jesus Guadalupe NAVARRO-PEREZ was identified as the driver and Veronica MARQUEZ-FRANCO was identified as the front passenger of the vehicle. MARQUEZ-FRANCO did most of the talking and displayed extreme nervousness.

4. Deputy Montgomery requested that NAVARRO-PEREZ exit the vehicle, and he agreed. As he was gathering information from NAVARRO-PEREZ, Deputy Montgomery asked if he could deploy his K-9 around the vehicle and NAVARRO-PEREZ consented. The K-9 was deployed and alerted to the odor of narcotics in the vehicle. A Washington City Police Officer arrived to assist with the search.

5. Prior to the search of the vehicle, MARQUEZ-FRANCO admitted that there was a small amount of marijuana in the vehicle. During a search of the vehicle, the officers located four "bundles" wrapped in cellophane concealed inside the center console and deep inside the rear quarter panels of the vehicle. The four "bundles" contained a total of approximately 11.18 pounds (5,071 grams) of small blue pills with the marking M30, believed to be counterfeit oxycodone pills that contain fentanyl.

6. Both NAVARRO-PEREZ and MARQUEZ-FRANCO were arrested and subsequently interviewed by investigators. Post-Miranda, NAVARRO-PEREZ admitted to knowing that there was drugs in the vehicle and they were on their way to drop the vehicle off in Denver, Colorado. Post-Miranda, MARQUEZ-FRANCO also admitted to knowing that there was drugs in the vehicle.


7. A sample of the blue pills from each bundle was sent to the Utah State Crime Lab for testing. The pills tested positive for the presence of fentanyl.

8. I have based this Complaint on my own experience and observations, along with a thorough review of all information pertaining to this investigation. I reviewed the law

enforcement reports related to NAVARRO-PEREZ and MARQUEZ-FRANCO's arrest that were generated by Deputy Montgomery and Washington County Drug Task Force officers, in addition to conducting my own investigation.


Based on the foregoing information, I respectfully request that a warrant of arrest be issued for Jesus Guadalupe NAVARRO-PEREZ and Veronica MARQUEZ-FRANCO for a violation of 21 U.S.C. § 841(a)(1), Possession of Fentanyl with Intent to Distribute.

DATED this 26th day of January, 2022.



NICK HIRSCHI, TFO
Department of Homeland Security
Homeland Security Investigations

SUBSCRIBED AND SWORN TO before me this 26 day of January, 2022.



PAUL KOHLER
United States Magistrate Judge

ANDREA T. MARTINEZ
United States Attorney

/s/ Angela M. Reddish-Day
ANGELA M. REDDISH-DAY
Assistant United States Attorney